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March 2, 1999

By Overnight Mail

Manning Gasch, Jr., Esq.
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Riverfront Plaza - East Tower
951 East Byrd Street
Richmond, VA 23219-4074

**Re: Request for Information Concerning Use and Disposal of PCBs in
AlliedSignal's Syracuse Works Facilities**

Dear Mr. Gasch:

The purpose of this letter is for the State of New York ("the State") and the United States Environmental Protection Agency ("EPA") to request supplemental information from AlliedSignal, Inc. ("AlliedSignal") concerning its Syracuse Works operations within the Onondaga Lake System i.e., the lake itself, its tributaries and the upland hazardous waste sites which have contributed or are contributing contamination to the lake. The information requested is intended to supplement and clarify information previously provided by AlliedSignal in its "Onondaga Lake RI/FS Site History Report," dated July 1992 ("Site History Report"), and in its responses, dated August 19, 1996 and May 14, 1997, to the Joint Requests for Information propounded by EPA and the State ("Joint Request Response").

I. Use and Disposal of PCBs at AlliedSignal's Syracuse Works

AlliedSignal's "Remedial Investigation Report for the LCP Bridge Street Facility, Solvay, New York" (hereinafter "the Bridge Street RI Report") disclosed that PCBs were found in soils, sediment, groundwater, surface water, and biota at the Bridge Street site. PCBs, including Aroclors 1254 and 1260, were found in the soils of the Equipment Graveyard area, the Western Rectifier area, the Brine Mud Disposal area, and the Liquid Chlorine Building at

levels up to 76ppm. Bridge Street RI Report at p. 86. Aroclor 1254 was found in sediments of the on-site ditch and the Ponded Area (Id. at p. 84); and PCBs were found in fish (Id. at p. 84), surface water (Id. at p. 83), and groundwater (Id. at page 87) at the Bridge Street site.

The prevalence of PCBs at the Bridge Street Site stands in sharp contrast to AlliedSignal's Site History Report and Joint Request Response which did not mention the disposal of PCBs at the Bridge Street facility.

In addition, recent sampling by AlliedSignal conducted pursuant to the sampling and analysis part of the "Geddes Brook/Nine Mile Creek Remedial Investigation Work Plan" disclosed the presence of another PCB, Aroclor 1268, in sediment within the Nine Mile Creek/Geddes Brook system, a tributary to Onondaga Lake which received waste, via the West Flume, from the Bridge Street Site, and in one whole fish sample from this system. The State has received information which suggests that AlliedSignal may have employed Aroclor 1268 as an impregnant for graphite anodes and related equipment used in the production of chlorine gas at AlliedSignal's Bridge Street facility. Enclosed is a copy of a memorandum dated July 31, 1970, from the manager of Allied's Brunswick, Georgia plant, Mr. B. T. Smith, to Mr. O. J. Parr, Director of Manufacturing-Planning in Morristown, New Jersey, which appears to refer to such use of Aroclor 1268.

This information concerning Aroclor 1268 appears to be at variance with previous disclosures by AlliedSignal concerning its production and waste generation processes. In the Site History Report, AlliedSignal identified several wastes generated from its chlor-alkali production processes at the Willis Avenue and Bridge Street plants. These wastes did not include Aroclor 1268. Site History Report at pp. 67-70. In addition, AlliedSignal identified several materials used to impregnate graphite anodes used in the production of chlorine at the Bridge Street plant, but did not include Aroclor 1268 among these materials. Id. at p. 70. AlliedSignal's Joint Request Response does not mention the use or disposal of Aroclor 1268 at the Bridge Street Site.

II. AlliedSignal's Duties to Provide the Requested Information

The State and EPA are propounding the following Requests for Information to obtain further information concerning the use of PCBs by AlliedSignal in production processes at the Syracuse Works, the generation of wastes containing PCBs, and the disposal of such wastes.

The State and EPA propound these information requests pursuant to the Consent Decree governing the Remedial Investigation/Feasibility Study for the Onondaga Lake System ("Consent Decree"), Article 27 of the New York Environmental Conservation Law, and Section 104(e) of the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA), 42 U.S.C. § 9604(e). Paragraph 27 of the Consent Decree requires that AlliedSignal submit the Site History Report. The information which the State and EPA are seeking concerns matters which should be addressed in such report but which AlliedSignal has not addressed.

Article 27 and other provisions of the New York Environmental Conservation Law and Section 104(e) of CERCLA authorize such information requests and require a recipient of such requests to provide the required information. See, e.g., ECL §§ 27-1307, 27-1309; 42 U.S.C. § 104(e).

Pursuant to ECL § 27-1307(3), AlliedSignal's answers to information requests shall constitute a "written instrument" within the meaning of New York Penal Law § 175.00. Submission of written answers containing false statements or false information is punishable pursuant to Penal Law § 175.30 and § 175.35.

AlliedSignal's failure to provide the information requested herein may result in the assessment of stipulated penalties pursuant to paragraphs 43 through 48 of the Consent Decree, a claim against AlliedSignal for civil penalties pursuant to ECL § 71-2705 based on its failure to perform a duty imposed by ECL Article 27, Title 13, a claim against AlliedSignal for injunctive relief and for civil penalties under Section 104(e)(5)(B) of CERCLA, 42 U.S.C. § 104(e)(5)(B), or other action by the State or EPA.

III. Definitions

1. The terms "and" as well as "or" shall be construed either disjunctively or conjunctively as necessary to bring within the scope of these questions any information which might otherwise be construed to be outside their scope.
2. The term "Syracuse Works" shall mean AlliedSignal's facility or facilities which now or in the past were owned, controlled, or operated by AlliedSignal or subsidiaries of AlliedSignal and located in whole or part within a fifty mile radius of Onondaga Lake in Syracuse, New York.
3. The term "AlliedSignal" refers not only to AlliedSignal, Inc, but also to all of its predecessors in interest and all of its subsidiaries, divisions, affiliates and branches, employees, agents, and consultants.
4. The term "PCBs" refers to any type of chlorinated biphenyl, including without limitation Aroclor 1254, Aroclor 1260, and Aroclor 1268.
5. The term "document" includes but is not limited to, the original(s) (or identical and legible copy thereof) and all non-identical copies (whether different from originals by reason of notations made on such copies or otherwise) of all books, records, letters, notes, memoranda, diaries and any other written or printed material, papers, bills, invoices, statements, maps, bills, invoices, telephone messages, tape recordings, transcripts of other notes or records of telephone conversations and conferences, work papers, computations, tabulations, blueprints, charts, photographs, drawings, computer printouts, agreements, specifications, vouchers, receipts, canceled checks, financial statements, information placed into the memory of a computer or computer disk whether or not such information was printed, and drafts of any of the foregoing, whether originals or copies.

6. The terms "concerning" or "relating" include referring to, concerning, relating to, embodying, having some connection with, commenting on, responding to, showing, describing, analyzing, reflecting or constituting.

7. The term "disposal" and its grammatical variants has the meaning set forth in the Comprehensive Environmental Response, Compensation and Liability Act, 42 U.S.C. § 9601(29).

IV. Instructions

1. A complete response must be made to each individual question in this Request for Information. Identify each answer with the number of the question to which it is addressed.

2. In preparing your response to each question, consult with all present and former employees and agents of your company who you have reason to believe may be familiar with the matter to which the question pertains.

3. In answering each question, identify all contributing sources of information.

4. If you are unable to answer a question in a detailed and complete manner or if you are unable to provide any of the information or documents requested, indicate the reason for your inability to do so. If you have reason to believe that there is an individual who may be able to provide more detail or documentation in response to any question, state that person's name and last known address and phone number and the reasons for your belief.

5. For each document produced in response to this Request for Information, indicate on the document, or in some other reasonable manner, the number of the question to which it applies.

6. If anything is deleted from a document produced in response to this Request for Information, state the reason for, and the subject matter of, the deletion.

7. If a document is requested but is not available, state the reason for its unavailability. In addition, to the best of your ability, identify any such document by author, date, subject matter, number of pages, and all recipients and their addresses.

8. If you cannot provide a precise answer to a question, please approximate, but in any such instance, state the reason for your inability to be more specific.

9. The State and EPA are aware of the activities conducted by AlliedSignal pursuant to the Onondaga Lake Bed RI/FS Consent Decree entered in 1992, as subsequently amended (including the subsequent Stipulation regarding the LCP Bridge Street facility and the Site History Report, and the latest update thereto) as well as the work conducted, or being conducted, pursuant to the Administrative Consent Orders between AlliedSignal and DEC regarding the "Waste Beds,"

"Semet Tar Beds," and "Willis Avenue" facilities. In your response to this request, you may incorporate documents ("Prior Submittals"), prepared pursuant to the Consent Decree and Consent Orders, by reference into your reply to the request. In doing so, you must reference each question in the response to the Prior Submittal being incorporated by reference, with a citation to the page(s) in the identified Prior Submittal(s) where the information is located, as well as the date of the documents. Any documents or information required by the joint request that are not present in Prior Submittals must still be provided. The State and EPA reserve the right to require documentation that was utilized for the compilation of the Prior Submittals to be provided at a later date.

10. The State and EPA request that you paginate each page of the response. Such pagination will facilitate future discussions among the State, EPA, and AlliedSignal, and ultimately will be to the mutual benefit of all concerned. Please use a six-digit pagination number starting with page 000001 for the initial cover letter. Please paginate all pages at the lower right corner when possible, including transmittal letters, correspondence, report covers, both sides of double-sided documents and all enclosures (e.g., maps and figures). Any follow-up mailings should be numbered sequentially. For example, if the last page of the first mailing is 000132, the cover letter for the second mailing should be stamped with number 000133.

11. Whenever in this Request for Information there is a request to identify a natural person or an entity other than a natural person, state, inter alia, the person or entity's full name and present or last known address.

12. If desired, you may assert a business confidentiality claim covering all or part of the information requested by this letter. The claim must be supported by each of the four factors specified in Section 104(e)(7)(E) of CERCLA, 42 U.S.C. § 9604(e)(7)(E), and regulations set forth in 40 C.F.R. Part 2, Subpart B, and be in accordance with those criteria as established pursuant to ECL Sections 17-0303(7), 19-0305(2) (a), 27-0919, 27-1311, 37-0105, 40-0109 (1) (b), (2) and paragraph 2(d) of Section 87 of the Public Officers Law of the State of New York and the rules and regulations promulgated pursuant thereto, and must be asserted at the time of submission, by placing on (or attaching to) the information a cover sheet, stamped or typed legend or other suitable form of notice employing language such as "trade secret," "proprietary" or "company confidential."

13. Information covered by such a claim of confidentiality will be disclosed by the State and EPA only to the extent and by means of procedures set forth in 40 C.F.R. Part 2, Subpart B, the above-referenced Sections of the ECL and in accordance with the applicable provisions of the Public Officers Law of the State of New York, respectively. If no such claim accompanies the information when it is received by the State and EPA, it may be made available to the public without further notice to you.

14. These requests encompass the entire time period during which AlliedSignal engaged in activities at any of the Syracuse Works facilities.

V. Requests for Information

Please provide sworn written answers to the requests for information below to the undersigned by no later than April 2, 1999:

1. Did AlliedSignal use, possess, or dispose of PCBs at any of its Syracuse Works facilities? If so, describe in reasonable detail the following:
 - A. The manner and purpose for which each type (e.g., Aroclor 1260) of PCBs was used, possessed or disposed of at each such facility.
 - B. The time periods and amounts for which each type of PCBs was used, possessed or disposed of at each such facility.
2. If PCBs were used to impregnate anodes, anode collars, or anode stems at any of AlliedSignal's Syracuse Works facilities, state the number of anodes, anode collars, and anode stems impregnated with each type of PCBs (including without limitation Aroclor 1268) in each year and the number of impregnated anodes, anode collars, or anode stems used in each production process in each year. Describe each such production process including a description of all pipes, trenches, floor drains, or other conduits or conveyances used to collect or transport wastes, or spills or leaks, from the production process.
3. Provide the names, addresses, and telephone numbers of any current or former AlliedSignal employees, agents, or consultants who obtained knowledge concerning the uses of PCBs at any Syracuse Works facilities.
4. Provide copies of any documents concerning or relating to the use, possession, or disposal of PCBs at any of AlliedSignal's Syracuse Works facilities, including any correspondence between any Allied Signal Syracuse Works facility and any other AlliedSignal facility concerning the use or potential use of PCBs in any production process at a Syracuse Works facility.
5. Provide all documents (including but not limited to invoices and financial ledgers) evidencing AlliedSignal's purchases of Aroclor 1268 or any other type of PCBs which materials were used in any of its Syracuse Works facilities.
6. Describe in reasonable detail:
 - A. The manner in which wastes containing each type of PCBs were generated at each of the Syracuse Works facilities.
 - B. The amounts of each type of PCBs generated as waste and the time period of its

generation in each such facility.

7. Provide copies of all documents concerning or relating to the generation of wastes containing PCBs at any of AlliedSignal's Syracuse Works facilities.

8. Describe in reasonable detail the means by which wastes containing each type of PCBs generated at any of AlliedSignal's Syracuse Works facilities were disposed at or near such facilities. Include a description of all pipes, floor drains, trenches, or other conduits or conveyances in which wastes containing such PCBs may have been conveyed from or within such facilities and identify the ultimate destination of such wastes (including locations of discharges into Onondaga Lake).

9. Provide copies of all documents concerning or relating to the disposal of wastes containing PCBs, including all documents concerning, relating to, or depicting the matters described in Request No. 8 above.

10. Provide copies of all analytical data, data summaries, reports or studies which were prepared by or on behalf of AlliedSignal, or which are within AlliedSignal's possession, custody or control, concerning analyses of soil, sediment, water, biota or any other media from the Onondaga Lake system for Aroclor 1268 or any other type of PCBs.

11. AlliedSignal's May 14, 1997 response (at pages 5, 8-10, 13-15) described various wastes containing PCBs which were generated by AlliedSignal at its Syracuse Works facilities and which were then transported and disposed of by third-parties.

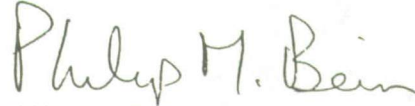
A. With respect to each shipment of waste identified in the May 14, 1997 response describe in reasonable detail the process resulting in the generation of such waste and identify the location of generation.

B. With respect to each shipment of waste identified in the May 14, 1997 response identify the type of PCB (e.g., Aroclor 1260) found in such waste. Confirm whether such waste was disposed of at the facilities indicated in the May 14, 1997 response. If not, identify the location and method of such disposal state and state whether such waste was disposed of at the Syracuse Works facilities.

C. The shipments of wastes disclosed in the May 14, 1997 response include the following waste streams: PCB transformers, PCB capacitors, PCB contaminated soils, PCB contaminated oil, PCB contaminated liquids, waste oil containing PCBs, PCB transformer oil and rinse, and PCB contaminated solids. For each such waste stream, identify all dates (or time periods) during which waste was generated by AlliedSignal (not limiting your response to the dates of shipments set forth in the May 14, 1997 response), state whether the waste was disposed of at the Syracuse Works facilities, and if so, identify the amounts, location, dates, and methods of such disposal.

12. Set forth the name, address, telephone number and employment position of every person who participated in preparing the responses to the above requests for information.

Very truly yours,



Philip M. Bein, Assistant Attorney General
John Davis, Environmental Scientist



Ben Conlon, Associate Attorney
New York State Department of
Environmental Conservation



George Shanahan, Assistant Regional
Counsel
United States Environmental Protection
Agency--Region II

Enclosure

Morristown, New Jersey

Brunswick, Georgia

Mr. O. J. Parr, Director

July 31, 1970

Manufacturing - Planning

TECHNICAL DEPARTMENT - 1971 PROGRAM
MANUFACTURING BULLETIN NO. 92

The following items are of interest to the Brunswick Works and would improve our cost if a suitable economic method could be found to improve the condition of these operations:

I. BRINE PURIFICATION:

Considerable difficulty has always been encountered in the removal of magnesium and calcium from brine circuit. Magnesium varies from 700 ppm to 100 ppm with calcium ratio from 1 - 3 to 1 - 1. This brings about an intolerable situation when we are running at full rate through the Dorr thickness. If some method could be found to maintain a low level of magnesium we could increase our cell efficiency and decrease our bleach production by lowering H_2 content of the chlorine.

II. ANODE DEGRADATION:

The Brunswick Works, Acme and now Bridge Street are impregnating the anodes. Monsanto Chemical no longer produces arcelor 1268 due to their pollution problems in its use and manufacture. We are now going to use Hallowax 1014 here at Brunswick. It is a similar product (chlorinated naphthylene) where arcelor 1268 was a chlorinated polypheyl. We are afraid, over a time period, probably Hallowax will be discontinued from the market and we will be without an impregnant. The V-100 cell could not operate on regular graphite without impregnation. If we did our cell labor would double and our graphite cost would increase an estimated 30 percent plus a considerable drop in cell efficiency.

Since evaluation of the wear rate requires a long period of time (18 to 20 months), we feel that other impregnants should be investigated. We tested Hallowax here eighteen (18) months ago and now have a good evaluation of its performance.

III. SALT RECOVERY FROM BITTERN PURL:

We feel this has merit and could amount to four to five thousand dollars per year plus a reduction in pollution liquid. We have looked at freezing and crystallizing out the $NaSO_4$ and recovering the brine and alkali.

IV. BRINE PURIFICATION OF BRINE STREAM:

Brine purification of brine stream from cell circuit utilizing a small leaf-filter rather than to contaminate evaporator system with mercury particles. Treatment of brine would result in tying up impurities in the filter cake and these could be easily disposed of without contaminating impure condensate and alkaline brine system.

V. REMOVAL OF MERCURY PARTICLES FROM H₂ GAS STREAM:

We have purchased a Brink recovery unit and its installation date is October 1, 1970, approximately. I am sure there are areas here of temperature control and other means of finding better recovery of our mercury losses.

VI. SULFIDE TREATMENT OF MERCURY WASTE:

We have not studied this as of now and could use help in this area to get started.

These are some of the areas with a good economic potential and we know there will be others as time permits everyone to sit down and think of new ideas.

B. T. Smith, Manager
Brunswick Works

BTS/cr